

## **ITP Straw Proposal #1 v.3a (10/15/13)**

### **Proposed Amendment to simplify and update CWC 10631 (f) and (g) Urban Water Management Plan Demand Management Section**

Purpose: Urban water suppliers are currently required in their urban water management plans to describe the demand management measures they are implementing or plan to implement based on a list of 14 measures in CWC 10631 (f). Suppliers not implementing or not planning to implement a measure must provide a cost benefit analysis for the measure and an explanation for why the measure is not being implemented. The goal of the recommendation is to simplify, clarify and update the demand reporting requirements in 10631 (f) and (g).

The recommendation would reduce the current list of measures that water suppliers are required to address from 14 to seven and further define the measures that wholesale suppliers must address. Retail suppliers would be required to address the following seven measures:

- System water audits, leak detection and repair
- Metering with commodity rates
- Public information programs
- School education programs
- Conservation pricing
- Water conservation coordinator
- Water waste prohibitions

Wholesale suppliers would address the following 2 measures:

- Leak Repairs and System Water Audits
- Wholesale Agency Assistance Programs

Suppliers not implementing a measure would be required to provide an explanation for why that measure was not being implemented.

In addition to these required measures, water suppliers would describe additional DMM's planned for implementation. At a minimum, the combination of required measures and additional optional measures would provide sufficient demand reduction to meet the water supplier's 2015 and 2020 water use targets. In developing a DMM implementation plan to meet the 20x2020 water use targets water suppliers can take into account demand reductions from water recycling and from new plumbing, building codes and landscape ordinances.

DWR should develop guidance to assist water suppliers in selecting the additional demand management measures necessary to meet the water use targets. The Department of Water Resources (DWR) in consultation with the California Urban Water Conservation Council (CUWCC) should develop and maintain a list of optional demand management measures that water suppliers could implement. This list at a minimum should contain the following elements:

- ordinances, plumbing codes, and/or rules requiring water-conserving plumbing fixtures to be installed in new structures and existing structures;
- programs for the replacement or retrofit of water-conserving plumbing fixtures in existing structures;
- a program for pressure control and/or reduction in the distribution system and/or for customer connections;
- programs and/or ordinance(s) for landscape water management.

DWR working with CUWCC shall also make available existing tools and develop new resources and guidance necessary to support agencies preparation of the demand management section in the UWMP. These resources will include but not be limited to defining a methodology to estimate water savings from plumbing codes, appliance standards and landscape ordinances. The water savings estimates from new codes, standards and ordinances could be used as part of water suppliers plan to meet the water use targets. These resources should be comprehensive enough to support suppliers of varying sizes and resources, allowing all suppliers to meet the full intent of the content and format requested for UWMP submissions.

The ITP further recommends that the description of the DMMs implemented or planned for implementation include the following information:

- 1.) A description of the previous level of DMM implementation
- 2.) An estimate of the level of planned DMM implementation
- 3.) An implementation schedule

Statutory Recommendations:

CWC section 10631 (f) should be amended to reduce the list of DMMs that are required to be describe from 14 DMM to the following 7 measures:

1. System water audits, leak detection and repair
2. Metering with commodity rates
3. Public information programs
4. School education programs
5. Conservation pricing
6. Water conservation coordinator
7. Water waste prohibitions

10631 (f) should further be amended to require water suppliers to describe additional DMMs so that the estimates of water savings from the 7 required DMMs, new water recycling projects, new plumbing codes, appliance standards or landscape ordinances and the additional DMMs be sufficient to meet the suppliers water use targets.

10631 (g) should be simplified to require water suppliers not implementing one of the 7 required measures to provide an explanation for why the DMM is not being implemented.

Guidance Recommendation:

The legislature should direct DWR to develop guidance and resources to assist water suppliers in describing the DMMs as required by 10631 (f). The guidance should include the following components:

- a. A list of optional DMM measures a supplier could choose to implement
- b. Resources and tools suppliers could use to estimate water savings from the required DMMs, optional DMMs and new plumbing codes, appliance standards and landscape ordinances.